UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	Case No. 1:23-cr-00490 (SHS)
Plaintiff,	:	
vs.	:	
ROBERT MENENDEZ, et als,	:	
Defendants.	:	

MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL OF RECORD

Pursuant to Local Criminal Rule 1.1(b) and Local Civil Rule 1.4 for the United States District Courts for the Southern and Eastern Districts of New York, the undersigned attorney Timothy M. Donohue, respectfully requests the withdrawal of Arleo & Donohue, LLC, as counsel of record for the defendant, Fred Daibes. As set forth in the accompanying Declaration of Timothy M. Donohue, Cesar DeCastro and Shannon McManus have entered appearances in this matter and will continue as counsel of record for Fred Daibes. Fred Daibes has consented to this withdrawal.

Dated: March 5, 2024

Respectfully submitted,

ARLEO & DONOHUE, LLC.

By: /s/ Timothy M. Donohue
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Counsel for Fred Daibes

SO ORDERED:

Hon. Sidney H. Stein, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2024, I served the foregoing Motion and accompanying Declaration of Timothy M. Donohue in support of the Motion on defendant Fred Daibes via electronic mail on consent.

/s/ Timothy M. Donohue
Timothy M. Donohue